

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SECURITIES AND EXCHANGE COMMISSION,
Plaintiff,

v.

NELSON GOMES, MICHAEL LUCKHOO-BOUCHE, SHANE SCHMIDT, DOUGLASS ROE, KELLY WARAWA, FFS CAPITAL LIMITED, PAIFANG TRADING LIMITED, ATLANTIAN MANAGEMENT CORPORATION, MEADOW ASIA LIMITED AND THYME INTERNATIONAL LIMITED,

Defendants.

Civil Action No. 20-CV-11092-FDS

ANSWER OF DEFENDANT MICHAEL LUCKHOO-BOUCHE

____ Defendant Michael Luckhoo-Bouche (“Luckhoo”) hereby answers the Complaint of the Securities and Exchange Commission and asserts his affirmative defenses as follows:

SUMMARY

1. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 1 of the Complaint and therefore denies them.

2. Defendant Luckhoo admits serving as nominal director of a brokerage account. With respect to the remaining allegations contained in Paragraph 2 of the Complaint, Defendant Luckhoo lacks information sufficient to form a belief as to the truth of the allegations and therefore denies them.

3. Defendant Luckhoo denies the allegations in Paragraph 3 of the Complaint insofar as they relate to himself, and lacks knowledge or information sufficient to form a belief as to the

truth of the remaining allegations contained in Paragraph 3 of the Complaint and therefore denies them.

4. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 4 of the Complaint and therefore denies them.

5. Defendant Luckhoo denies the allegations in Paragraph 5 of the Complaint insofar as they relate to himself, and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 5 of the Complaint and therefore denies them.

6. Paragraph 6 of the Complaint contains legal conclusions, to which no response is required. To the extent a response is deemed required, Defendant Luckhoo answers: Denied.

7. Paragraph 7 of the Complaint contains legal conclusions, to which no response is required. To the extent a response is deemed required, Defendant Luckhoo answers: Denied.

8. Paragraph 8 of the Complaint contains legal conclusions, to which no response is required. To the extent a response is deemed required, Defendant Luckhoo answers: Denied.

9. Paragraph 9 of the Complaint sets forth the SEC's requested relief, which requires no response. To the extent a response is deemed required, Defendant Luckhoo denies that the SEC is entitled to any relief.

10. Paragraph 10 of the Complaint sets forth the SEC's requested relief, which requires no response. To the extent a response is deemed required, Defendant Luckhoo denies that the SEC is entitled to any relief.

JURISDICTION AND VENUE

11. Paragraph 11 of the Complaint contains legal conclusions, to which no response is required.

12. Paragraph 12 of the Complaint contains both legal conclusions to which no response is required, and factual allegations with respect to which Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to their truth and therefore denies them..

DEFENDANTS

13. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 13 of the Complaint and therefore denies them.

14. Defendant Luckhoo admits the allegations contained in Paragraph 14 of the Complaint.

15. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 15 of the Complaint and therefore denies them.

16. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 16 of the Complaint and therefore denies them.

17. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 17 of the Complaint and therefore denies them.

18. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 18 of the Complaint and therefore denies them.

19. Defendant Luckhoo denies the allegation in Paragraph 19 of the Complaint that he is a director of Paifang, but Defendant Luckhoo admits that he was a director of Paifang from 9/5/2019 through 5/4/2020. Defendant Luckhoo admits the remaining allegations contained in Paragraph 19 of the Complaint.

20. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 20 of the Complaint and therefore denies them.

21. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 21 of the Complaint and therefore denies them.

22. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 22 of the Complaint and therefore denies them.

23. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 23 of the Complaint and therefore denies them.

BACKGROUND

24. Paragraph 24 of the Complaint contains legal conclusions, to which no response is required.

25. Paragraph 25 of the Complaint contains legal conclusions, to which no response is required.

26. Paragraph 26 of the Complaint contains legal conclusions, to which no response is required.

27. Paragraph 27 of the Complaint contains legal conclusions, to which no response is required.

28. Paragraph 28 of the Complaint contains legal conclusions, to which no response is required.

29. Paragraph 29 of the Complaint contains legal conclusions, to which no response is required.

30. Paragraph 30 of the Complaint contains legal conclusions, to which no response is required.

OVERVIEW OF GOMES' CONDUCT

31. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 31 of the Complaint and therefore denies them.

32. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 32 of the Complaint and therefore denies them.

33. Defendant Luckhoo denies the allegation contained in Paragraph 33 of the Complaint that he is part of any "Gomes Group" and further denies the remaining allegations insofar as they relate to himself, and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations involving the Gomes Group contained in Paragraph 33 of the Complaint and therefore denies them.

34. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 34 of the Complaint and therefore denies them.

35. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 35 of the Complaint and therefore denies

them. Paragraph 35 of the Complaint also includes legal conclusions, to which no response is required.

36. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 36 of the Complaint and therefore denies them.

EXAMPLE: SANDY STEELE

37. Defendant Luckhoo admits Sandy Steele is a publicly traded company, but lacks information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 37 of the Complaint and therefore denies them.

38. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 38 of the Complaint and therefore denies them.

39. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 39 of the Complaint and therefore denies them.

40. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 40 of the Complaint and therefore denies them.

41. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 41 of the Complaint and therefore denies them.

42. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 42 of the Complaint and therefore denies them.

43. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 43 of the Complaint and therefore denies them.

44. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 44 of the Complaint and therefore denies them.

45. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 45 of the Complaint and therefore denies them.

46. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 46 of the Complaint and therefore denies them.

47. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 47 of the Complaint and therefore denies them.

48. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 48 of the Complaint and therefore denies them.

49. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 49 of the Complaint and therefore denies them.

50. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 50 of the Complaint and therefore denies them.

51. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 51 of the Complaint and therefore denies them.

52. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 52 of the Complaint and therefore denies them.

53. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 53 of the Complaint and therefore denies them.

54. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 54 of the Complaint and therefore denies them.

55. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 55 of the Complaint and therefore denies them.

56. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 56 of the Complaint and therefore denies them.

57. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 57 of the Complaint and therefore denies them.

58. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 58 of the Complaint and therefore denies them.

59. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 59 of the Complaint and therefore denies them.

60. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 60 of the Complaint and therefore denies them.

61. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 61 of the Complaint and therefore denies them.

62. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 62 of the Complaint and therefore denies them.

63. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 63 of the Complaint and therefore denies them.

64. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 64 of the Complaint and therefore denies them.

65. Defendant Luckhoo as set forth in Paragraph 19 of his Answer admits that he submitted paperwork authorizing Gomes to trade on behalf of Paifang, however, Defendant Luckhoo denies the allegation contained in Paragraph 65 of the Complaint that he gave Gomes trading authority beyond his act of submitting the paperwork. With respect to the remaining allegations contained in Paragraph 65 of the Complaint Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies them.

66. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 66 of the Complaint and therefore denies them.

67. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 67 of the Complaint and therefore denies them.

68. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 68 of the Complaint and therefore denies them.

69. Defendant Luckhoo denies the allegation contained in Paragraph 69 of the Complaint that he knew or was reckless in not knowing he was using Paifang to create a layer of anonymity to facilitate Gomes' sales. With respect to the remaining allegations of Paragraph 69, Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to their truth and therefore denies them.

70. Defendant Luckhoo denies the allegation contained in Paragraph 70 of the Complaint that he knew or was reckless in not knowing that defendants were dumping Sandy Steele shares to investors, and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations and therefore denies them.

SALES OF OTHER COMPANIES' STOCK

71. Defendant Luckhoo denies the allegations in Paragraph 71 of the Complaint insofar as they relate to himself, and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 71 of the Complaint and therefore denies them.

Additional Examples

72. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 72 of the Complaint and therefore denies them.

73. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 73 of the Complaint and therefore denies them.

74. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 74 of the Complaint and therefore denies them.

75. Defendant Luckhoo as set forth in Paragraphs 19 and 65 of his Answer admits submitting paperwork regarding Gomes' trading authority. Defendant Luckhoo denies the allegation contained in Paragraph 75 of the Complaint that he arranged the deposit of FFS Capital shares of Bioscience, but admits the allegation that he assisted the deposit of Paifang shares of Bioscience. With respect to the remaining allegations contained in Paragraph 75 of the Complaint Defendant Luckhoo lacks knowledge or sufficient information to form a belief as to the truth of the allegations and therefore denies them.

76. Defendant Luckhoo as set forth in Paragraph 75 of his Answer denies the allegation contained in Paragraph 76 of the Complaint that he arranged the deposit of FFS Capital shares of Bioscience, but admits he assisted the deposit of Paifang shares of Bioscience. With respect to the remaining allegations contained in Paragraph 76 of the Complaint, Defendant Luckhoo lacks knowledge or sufficient information to form a belief as to their truth and therefore denies them.

77. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 77 of the Complaint and therefore denies them.

78. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 78 of the Complaint and therefore denies them.

79. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 79 of the Complaint and therefore denies them.

80. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 80 of the Complaint and therefore denies them.

81. Defendant Luckhoo denies the allegation contained in Paragraph 81 of the Complaint that he knew or was reckless in not knowing he was using Paifang to create a layer of anonymity to facilitate Gomes' sales of Bioscience shares. With respect to the remaining allegations of the Paragraph Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies them.

82. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 82 of the Complaint and therefore denies them.

83. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 83 of the Complaint and therefore denies them.

84. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 84 of the Complaint and therefore denies them.

85. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 85 of the Complaint and therefore denies them.

86. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 86 of the Complaint and therefore denies them.

87. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 87 of the Complaint and therefore denies them.

88.. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 88 of the Complaint and therefore denies them.

89. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 89 of the Complaint and therefore denies them.

90. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 90 of the Complaint and therefore denies them.

91. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 91 of the Complaint and therefore denies them.

92. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 92 of the Complaint and therefore denies them.

93. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 93 of the Complaint and therefore denies them.

94. Defendant Luckhoo as set forth in Paragraph 33 of his Answer denies the allegation that he is part of any “Gomes Group” and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 94 of the Complaint and therefore denies them.

FIRST CLAIM FOR RELIEF
FRAUD IN THE OFFER OR SALE OF SECURITIES
(Violations of Sections 17(a)(1), (3) of the Securities Act by Gomes, FFS Capital, Schmidt, Roe, Warawa, Luckhoo, and Atlantean)

95. Defendant Luckhoo incorporates by reference his responses to Paragraphs 1-94 of the Complaint.

96. Paragraph 96 of the Complaint contains legal conclusions to which no response is required. To the extent a response is deemed required, Defendant Luckhoo answers: Denied.

97. Paragraph 97 of the Complaint contains legal conclusions to which no response is required. To the extent a response is deemed required, Defendant Luckhoo answers: Denied.

SECOND CLAIM FOR RELIEF
FRAUD IN CONNECTION WITH THE PURCHASE OR SALE OF SECURITIES

**(Violations of Section 10(b) of the Exchange Act and Rules 10b-5(a) and (c) thereunder by
Gomes, FFS Capital, Schmidt, Roe, Warawa, Luckhoo, and Atlantean)**

98. Defendant Luckhoo incorporates by reference his responses to Paragraphs 1-97 of the Complaint.

99. Paragraph 99 of the Complaint contains legal conclusions to which no response is required. To the extent a response is deemed required, Defendant Luckhoo answers: Denied.

100. Paragraph 100 of the Complaint contains legal conclusions to which no response is required. To the extent a response is deemed required, Defendant Luckhoo answers: Denied

THIRD CLAIM FOR RELIEF
FRAUD IN CONNECTION WITH THE PURCHASE OR SALE OF SECURITIES
(Violations of Section 10(b) of the Exchange Act and Rule 10b-5(b) by Schmidt)

101. Defendant Luckhoo incorporates by reference his responses to Paragraphs 1-100 of the Complaint.

102. Paragraph 102 of the Complaint contains legal conclusions to which no response is required, and, further, the claim is not asserted against Defendant Luckhoo. To the extent a response is deemed required, Defendant Luckhoo answers: Denied.

103. Paragraph 103 of the Complaint contains legal conclusions to which no response is required and, further, the claim is not asserted against Defendant Luckhoo. To the extent a response is deemed required, Defendant Luckhoo answers: Denied.

FOURTH CLAIM FOR RELIEF
UNREGISTERED OFFERINGS OF SECURITIES
(Violations of Sections 5(a) and 5(c) of the Securities Act by Gomes, FFS Capital, Roe, Warawa, Luckhoo, Atlantean, Paifang, Artefactor, Meadow Asia, and Thyme International)

104. Defendant Luckhoo incorporates by reference his responses to Paragraphs 1-103 of the Complaint.

105. Paragraph 105 of the Complaint contains legal conclusions to which no response is required. To the extent a response is deemed required, Defendant Luckhoo answers: Denied.

106. Paragraph 106 of the Complaint contains legal conclusions to which no response is required. To the extent a response is deemed required, Defendant Luckhoo answers: Denied.

FIFTH CLAIM FOR RELIEF
FAILURE TO REPORT OVER 5% BENEFICIAL OWNERSHIP
(Violation of Section 13(d)(1) and Rule 13d-1 by Gomes)

107. Defendant Luckhoo incorporates by reference his responses to Paragraphs 1-106 of the Complaint.

108. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 108 of the Complaint and therefore denies them.

109. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 109 of the Complaint and therefore denies them.

110. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 110 of the Complaint and therefore denies them.

111. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 111 of the Complaint and therefore denies them.

112. Paragraph 112 of the Complaint contains legal conclusions to which no response is required and, further, the claim is not asserted against Defendant Luckhoo. To the extent a response is deemed required, Defendant Luckhoo answers: Denied..

SIXTH CLAIM FOR RELIEF
AIDING AND ABETTING
(Violations of Section 15(b) of the Securities Act by Gomes, Luckhoo, and FFS Capital)

113. Defendant Luckhoo incorporates by reference his responses to Paragraphs 1-112 of the Complaint.

114. Paragraph 114 of the Complaint contains legal conclusions to which no response is required. To the extent a response is deemed required, Defendant Luckhoo answers: Denied..

115. Paragraph 115 of the Complaint contains legal conclusions to which no response is required. To the extent a response is deemed required, Defendant Luckhoo answers: Denied..

116. Defendant Luckhoo denies the allegation in Paragraph 116 of the Complaint that he knowingly or recklessly provided substantial assistance. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in the Paragraph and therefore denies them.

117. Defendant Luckhoo denies the allegation in Paragraph 117 of the Complaint that he knowingly or recklessly provided substantial assistance. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in the Paragraph and therefore denies them.

118. Paragraph 118 of the Complaint contains legal conclusions to which no response is required. To the extent a response is deemed required, Defendant Luckhoo answers: Denied..

SEVENTH CLAIM FOR RELIEF
AIDING AND ABETTING

(Violations of Section 20(e) of the Exchange Act by Gomes, Luckhoo, and FFS Capital)

119. Defendant Luckhoo incorporates by reference his responses to Paragraphs 1-118 of the Complaint.

120. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 120 of the Complaint and therefore denies them.

121. Defendant Luckhoo denies the allegation in Paragraph 121 of the Complaint that he knowingly or recklessly provided substantial assistance. Defendant Luckhoo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in the Paragraph and therefore denies them.

122. Paragraph 122 of the Complaint contains legal conclusions to which no response is required. To the extent a response is deemed required, Defendant Luckhoo answers: Denied..

PRAYER FOR RELIEF

WHEREFORE, Defendant Luckhoo denies that Plaintiff SEC is entitled to any of the relief requested in the unnumbered “**WHEREFORE**” clause following Paragraph 122, including

subparts (A) through (I), and respectfully requests that the Court dismiss the Complaint in its entirety as against him.

JURY DEMAND

The final paragraph requires no response.

AFFIRMATIVE DEFENSES

FIRST DEFENSE

The Complaint fails to state a claim as against Defendant Luckhoo upon which relief may be granted.

SECOND DEFENSE

The claims set forth in the Complaint as against Defendant Luckhoo are barred, in whole or in part, by applicable statutes of limitation.

Dated: August 31, 2020

Respectfully submitted,
Michael Luckhoo-Bouche
By his attorney,

/s/ Juan M. Marcelino, Esq.

Juan M. Marcelino, BBO No. 318810
juanmmarcelino@gmail.com
360 Forest Street
Bridgewater, MA 02324
Tel. 617-794-8773

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served by ECF on counsel for the Securities and Exchange Commission on August 31, 2020.

/s/ Juan M. Marcelino

Juan M. Marcelino

